

GE 159 Plostics Avenue Pittsfield, MA 01201

Transmitted Via Overnight Delivery

July 30, 2007

Mr. Dean Tagliaferro
EPA Project Coordinator
United States Environmental Protection Agency
c/o Weston Solutions
10 Lyman Street
Pittsfield, MA 01210

Re: Floodplain GE-Pittsfield/Housatonic River Site
Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of
Housatonic River (GECD710 and GECD720)
Addendum to Supplemental Information Package for Selected Phase 2 Floodplain Properties

Dear Mr. Tagliaferro:

On May 29, 2007, the General Electric Company (GE) submitted a document to the United States Environmental Protection Agency (EPA) titled Supplemental Information Package for Selected Phase 2 Floodplain Properties (SIP). EPA conditionally approved the SIP in a letter to GE dated July 17, 2007. In that letter, EPA directed GE to propose an alternate topsoil source and make certain modifications to the Tree/Shrub Inventory and Restoration Plan included as part of the SIP. As such, GE has prepared this Addendum to Supplemental Information Package for Selected Phase 2 Floodplain Properties (Addendum) to address comments raised by EPA in its July 17, 2007 letter.

Condition No. 1 of EPA's above-referenced conditional approval letter directed GE to propose an alternate topsoil source to that presented in the SIP. GE sampled a new topsoil stockpile located at Maxymillian Technologies, Inc.'s facility in Pittsfield, Massachusetts. Analytical results associated with this sampling are summarized in Table 1. Based on these results, GE proposes to use this topsoil source during restoration activities at the Phase 2 floodplain properties.

In accordance with Condition No. 2 of EPA's letter, GE has revised the Tree/Shrub Inventory and Restoration Plan previously included as Attachment E to the SIP. Specifically, Table E-2 of this plan has been modified to require that all proposed small trees/shrubs (box elders, sugar maples and any substitutions) be a minimum of four feet in height. In addition, GE has eliminated the proposed planting of the Staghorn Sumac (Rhus typhina) in Planting Area 5. The revised Tree/Shrub Inventory and Restoration Plan for the Phase 2 floodplain properties is provided in Attachment A.

In addition to the above, and in accordance with Conditions Nos. 3 and 4 of EPA's letter, GE will obtain EPA approval for any modifications to the Tree/Shrub Inventory and Restoration Plan based on property owner requests or lack of availability of the proposed trees and shrubs. GE will also replace any trees or shrubs located in the area associated with EPA's restoration of the 1½ Mile Reach that are damaged by GE's contractor (if any).

In accordance with Condition No. 5 of EPA's letter, GE will initiate remediation activities at the Phase 2 floodplain properties within 14 days of EPA's approval of this Addendum. In the meantime, please feel free to contact me if you have any questions or comments regarding this letter or the attached information.

Sincerely,

Richard W. Gates

Remediation Project Manager

Richard W. Gates/see

ACC/csc Attachments

cc: Timothy Conway, EPA
Rose Howell, EPA*
Holly Inglis, EPA
K.C. Mitkevicius, USACE (CD-ROM)
Linda Palmieri, Weston (2 copies) (CD-ROM)
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Mayor James Ruberto, City of Pittsfield Jeffrey Bernstein, Bernstein, Cushner & Kimmel Michael Carroll, GE*
Andrew Silfer, GE
Rod McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Property Owner — Parcels I8-4-201 & -202
Property Owner — Parcels I8-4-2, -3, -4
Property Owner — Parcel I8-4-6
Public Information Repositories
GE Internal Repository

^{*} cover letter only



Table

ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE

ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR SELECTED PHASE 2 FLOODPLAIN PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

(Results are presented in dry weight parts per million, ppm)

	Sample ID:	Maxymillian-Topsoil-1
Parameter	Date Collected:	07/02/07
Volatile Organics		
1,1,1,2-Tetrachloroethane		ND(0.0054)
1,1,1-Trichloroethane		ND(0.0054)
1,1,2,2-Tetrachloroethane		ND(0.0054)
1,1,2-Trichloroethane		ND(0.0054)
1,1-Dichloroethane		ND(0.0054)
1,1-Dichloroethene		ND(0.0054)
1,2,3-Trichloropropane		ND(0.0054)
1,2-Dibromo-3-chloropropa	ine	ND(0.027)
1,2-Dibromoethane		ND(0.0054)
1,2-Dichloroethane		ND(0.0054)
1,2-Dichloropropane		ND(0.0054)
1,4-Dioxane		ND(5.4)
2-Butanone		0.013
2-Chloro-1,3-butadiene		ND(0.0054)
2-Chloroethylvinylether		ND(0.027)
2-Hexanone		ND(0.0054)
3-Chloropropene		ND(0.0054)
4-Methyl-2-pentanone		ND(0.0054)
Acetone		0.076
Acetonitrile		ND(1.1)
Acrolein		ND(0.067)
Acrylonitrile		ND(0.054)
Benzene		ND(0.0054)
Bromodichloromethane		ND(0.0054)
Bromoform		ND(0.0054)
Bromomethane		ND(0.0054)
Carbon Disulfide		ND(0.0054)
Carbon Tetrachloride		ND(0.0054)
Chlorobenzene		ND(0.0054)
Chloroethane		ND(0.0054)
Chloroform		ND(0.0054)
Chloromethane		ND(0.0054)
cis-1,3-Dichloropropene Dibromochloromethane		ND(0.0054)
		ND(0.0054)
Dibromomethane Dichlorodifluoromethane		ND(0.0054) ND(0.0054)
Ethyl Methacrylate		ND(0.0054)
Ethylbenzene		ND(0.0054)
Iodomethane		ND(0.0054)
Isobutanol		ND(0.0034)
Methacrylonitrile		ND(2.7)
Methyl Methacrylate		ND(0.0054)
Methylene Chloride		0.0077
Propionitrile		ND(1.1)
Styrene		ND(1.1) ND(0.0054)
Tetrachloroethene		ND(0.0054)
Toluene		ND(0.0054)
trans-1,2-Dichloroethene		ND(0.0054)
trans-1,3-Dichloropropene		ND(0.0054)
trans-1,4-Dichloro-2-butene	9	ND(0.012)
Trichloroethene	-	ND(0.0054)
Trichlorofluoromethane		ND(0.0054)
Vinyl Acetate		ND(0.0034)
Vinyl Chloride		ND(0.0054)
Xylenes (total)		0.0050 J
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ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE

ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR SELECTED PHASE 2 FLOODPLAIN PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

(Results are presented in dry weight parts per million, ppm)

	Sample ID:	Maxymillian-Topsoil-1
Parameter	Date Collected:	07/02/07
PCBs		
Aroclor-1016		ND(0.035)
Aroclor-1221		ND(0.035)
Aroclor-1232		ND(0.035)
Aroclor-1242		ND(0.035)
Aroclor-1248		ND(0.035)
Aroclor-1254		ND(0.035)
Aroclor-1260		ND(0.035)
Total PCBs		ND(0.035)
Semivolatile Organics		115 (2.22)
1,2,4,5-Tetrachlorobenzen	ie	ND(0.36)
1,2,4-Trichlorobenzene		ND(0.36)
1,2-Dichlorobenzene		ND(0.36)
1,3,5-Trinitrobenzene		ND(1.8)
1,3-Dichlorobenzene 1,3-Dinitrobenzene		ND(0.36)
1,4-Dichlorobenzene		ND(0.36) ND(0.36)
1,4-Naphthoquinone		ND(0.36)
1-Naphthylamine		ND(1.8)
2,3,4,6-Tetrachlorophenol		ND(1.0) ND(0.36)
2,4,5-Trichlorophenol		ND(0.36)
2,4,6-Trichlorophenol		ND(0.36)
2,4-Dichlorophenol		ND(0.36)
2,4-Dimethylphenol		ND(0.36)
2,4-Dinitrophenol		ND(1.8)
2,4-Dinitrotoluene		ND(0.36)
2,6-Dichlorophenol		ND(0.36)
2,6-Dinitrotoluene		ND(0.36)
2-Acetylaminofluorene		ND(0.73)
2-Chloronaphthalene		ND(0.36)
2-Chlorophenol		ND(0.36)
2-Methylnaphthalene		ND(0.36)
2-Methylphenol		ND(0.36)
2-Naphthylamine		ND(1.8)
2-Nitroaniline		ND(0.36)
2-Nitrophenol		ND(0.36)
2-Picoline		ND(0.36)
3&4-Methylphenol		ND(0.36)
3,3'-Dichlorobenzidine		ND(0.73)
3,3'-Dimethylbenzidine		ND(1.8)
3-Methylcholanthrene		ND(0.36)
3-Nitroaniline	ı	ND(1.8)
4,6-Dinitro-2-methylpheno	ı	ND(1.8)
4-Aminobiphenyl	or.	ND(0.36) ND(0.36)
4-Bromophenyl-phenylethouse 4-Chloro-3-Methylphenol	eı	ND(0.36)
4-Chloroaniline		ND(1.8)
4-Chlorobenzilate		ND(0.36)
4-Chlorophenyl-phenyleth	er	ND(0.36)
4-Nitroaniline	O1	ND(1.8)
4-Nitrophenol		ND(1.8)
4-Nitroquinoline-1-oxide		ND(1.8)
4-Phenylenediamine		ND(0.73)
5-Nitro-o-toluidine		ND(0.36)
7,12-Dimethylbenz(a)anth	racene	ND(0.36)
a,a'-Dimethylphenethylam		ND(1.8)
Acenaphthene		ND(0.36)
Acenaphthylene		ND(0.36)
Acetophenone		ND(0.36)

ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE

ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR SELECTED PHASE 2 FLOODPLAIN PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

(Results are presented in dry weight parts per million, ppm)

Sample I	D: Maxymillian-Topsoil-1
Parameter Date Collecte	
Semivolatile Organics (continued)	
Aniline	ND(0.36)
Anthracene	ND(0.36)
Aramite	ND(0.36)
Azobenzene	ND(0.36)
Benzidine	ND(0.73)
Benzo(a)anthracene	0.073 J
Benzo(a)pyrene	0.084 J
Benzo(b)fluoranthene	0.084 J
Benzo(g,h,i)perylene	ND(0.36)
Benzo(k)fluoranthene	ND(0.36)
Benzyl Alcohol	ND(0.73)
bis(2-Chloroethoxy)methane	ND(0.36)
bis(2-Chloroethyl)ether	ND(0.36)
bis(2-Chloroisopropyl)ether	ND(0.36)
bis(2-Ethylhexyl)phthalate	0.080 J
Butylbenzylphthalate	ND(0.36)
Chrysene	0.091 J
Diallate	ND(0.36)
Dibenzo(a,h)anthracene	ND(0.36)
Dibenzofuran	ND(0.36)
Diethylphthalate Dimethylphthalate	ND(0.36) ND(0.36)
7.1	` '
Di-n-Butylphthalate Di-n-Octylphthalate	ND(0.36)
Diphenylamine	ND(0.36) ND(0.36)
Ethyl Methanesulfonate	ND(0.36)
Fluoranthene	0.13 J
Fluorene	ND(0.36)
Hexachlorobenzene	ND(0.36)
Hexachlorobutadiene	ND(0.36)
Hexachlorocyclopentadiene	ND(0.73)
Hexachloroethane	ND(0.36)
Hexachlorophene	ND(0.36)
Hexachloropropene	ND(0.73)
Indeno(1,2,3-cd)pyrene	ND(0.36)
Isodrin	ND(0.36)
Isophorone	ND(0.36)
Isosafrole	ND(0.36)
Methapyrilene	ND(0.36)
Methyl Methanesulfonate	ND(0.36)
Naphthalene	ND(0.36)
Nitrobenzene	ND(0.36)
N-Nitrosodiethylamine	ND(0.36)
N-Nitrosodimethylamine	ND(0.36)
N-Nitroso-di-n-butylamine	ND(0.36)
N-Nitroso-di-n-propylamine	ND(0.36)
N-Nitrosodiphenylamine	ND(0.36)
N-Nitrosomethylethylamine	ND(0.36)
N-Nitrosomorpholine	ND(0.36)
N-Nitrosopiperidine	ND(0.36)
N-Nitrosopyrrolidine	ND(0.36)
o,o,o-Triethylphosphorothioate	ND(0.36)
o-Toluidine	ND(0.36)
p-Dimethylaminoazobenzene	ND(0.36)
Pentachlorobenzene	ND(0.36)
Pentachloroethane	ND(0.36)
Pentachloronitrobenzene	ND(0.36)
Pentachlorophenol	ND(1.8)

ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE

ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR SELECTED PHASE 2 FLOODPLAIN PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: Date Collected:	Maxymillian-Topsoil-1 07/02/07		
Semivolatile Organics (co	Semivolatile Organics (continued)			
Phenacetin		ND(0.36)		
Phenanthrene		0.055 J		
Phenol		ND(0.36)		
Pronamide		ND(0.36)		
Pyrene		0.16 J		
Pyridine		ND(0.36)		
Safrole		ND(0.36)		
Thionazin		ND(0.73)		
Inorganics				
Antimony		ND(4.24)		
Arsenic		7.39		
Barium		84.7		
Beryllium		ND(1.06)		
Cadmium		1.00 B		
Chromium		14.5		
Cobalt		9.08		
Copper		19.2		
Lead		22.6		
Mercury		0.0877		
Nickel		17.8		
Selenium		2.03 B		
Silver		ND(1.06)		
Thallium		ND(1.06)		
Tin		1.19		
Vanadium		15.7		
Zinc		63.4		

Notes:

- Samples were collected by ARCADIS BBL, and submitted to SGS Environmental Services, Inc. for analysis of Appendix IX+3 constituents.
- 2. ND Analyte was not detected. The number in parentheses is the associated detection limit.

Data Qualifiers:

Organics (PCBs, volatiles, semivolatiles)

J - Indicates an estimated value less than the practical quantitation limit (PQL).

Inorganics

B - Indicates an estimated value between the instrument detection limit (IDL) and (PQL).

ARCADIS BBL

Attachment A

Revised Tree/Shrub Inventory and Restoration Plan

TABLE E-1

TREE/SHRUB INVENTORY

ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR SELECTED PHASE 2 FLOODPLAIN PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

		Туре		
Survey Area	Parcel(s)	(inches in diameter)	Quantity	Species
1	18-4-2,-3,-4		0	None Observed
2	18-4-2,-3,-4	Shrub	5	Box Elder (Acer negundo)
2	10 4 0 0 4 40 4 7	Tree (15")	2	Sugar Maple (Acer saccharum)
3	18-4-2,-3,-4; 18-4-7	Tree (12")	1	Sugar Maple (Acer saccharum)
4	18-4-7; 18-4-201/202		0	None Observed
5		Tree (16")	1	Black Cherry (Prunus serotina)
		Tree (18")	1	Sugar Maple (Acer saccharum)
	19.4.204/202	Shrub	9	Sugar Maple (Acer saccharum)
	l8-4-201/202	Shrub	2	Flowering Dogwood (Cornus florida)
		Shrub	1	Box Elder (Acer negundo)
		Shrub	1	Staghorn Sumac (Rhus typhina)

Notes:

- 1. Inventory of Parcels I8-4-2,-3,-4; I8-4-7; and I8-4-201/202 performed by ARCADIS BBL on behalf of GE in May 2007.
- 2. Shrubs are defined as plants less than six feet in height.
- 3. Refer to Figure E-1 for tree/shrub survey areas.
- 4. -- Not applicable.

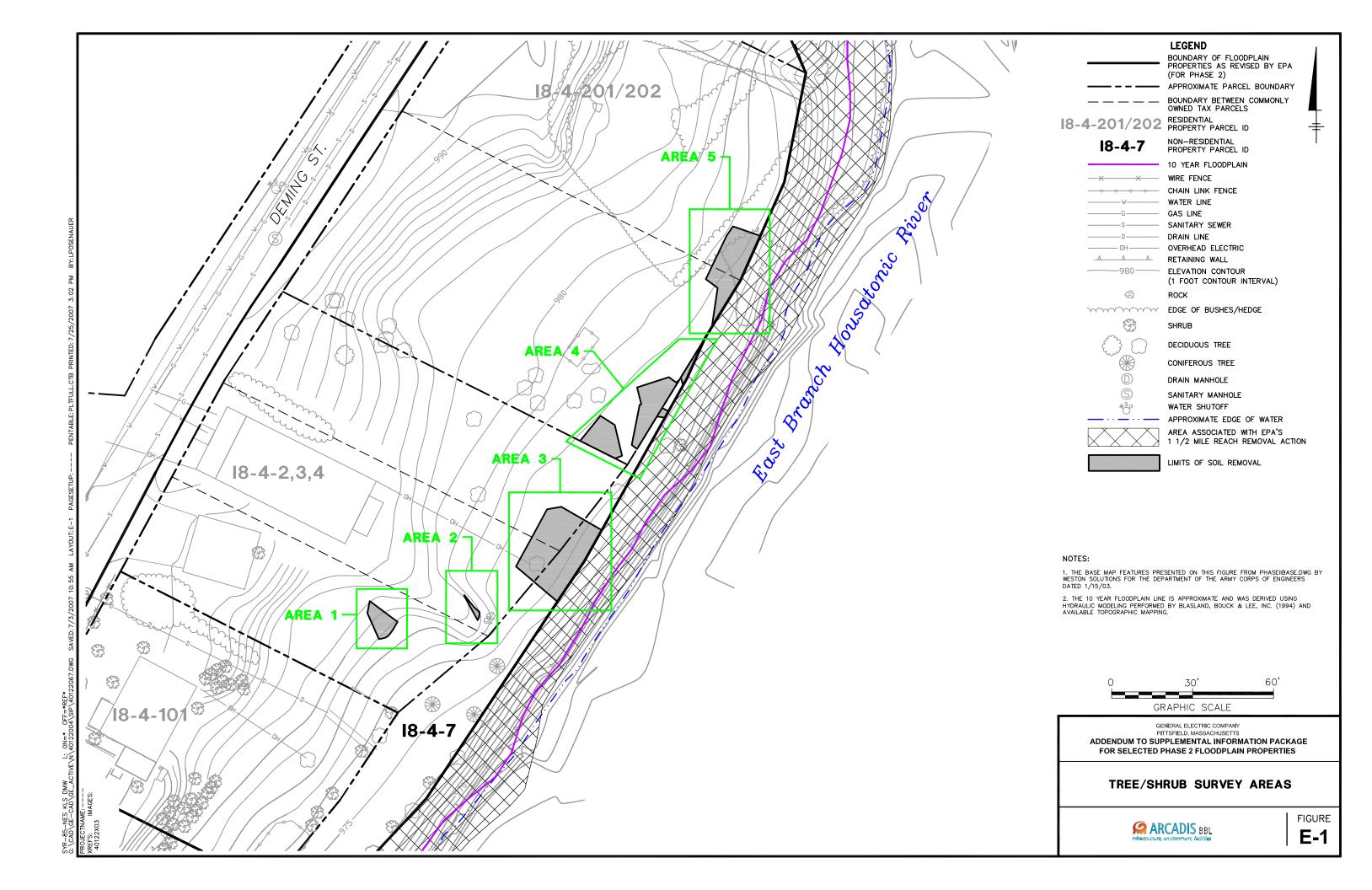


TABLE E-2

TREE/SHRUB PLANTING PLAN

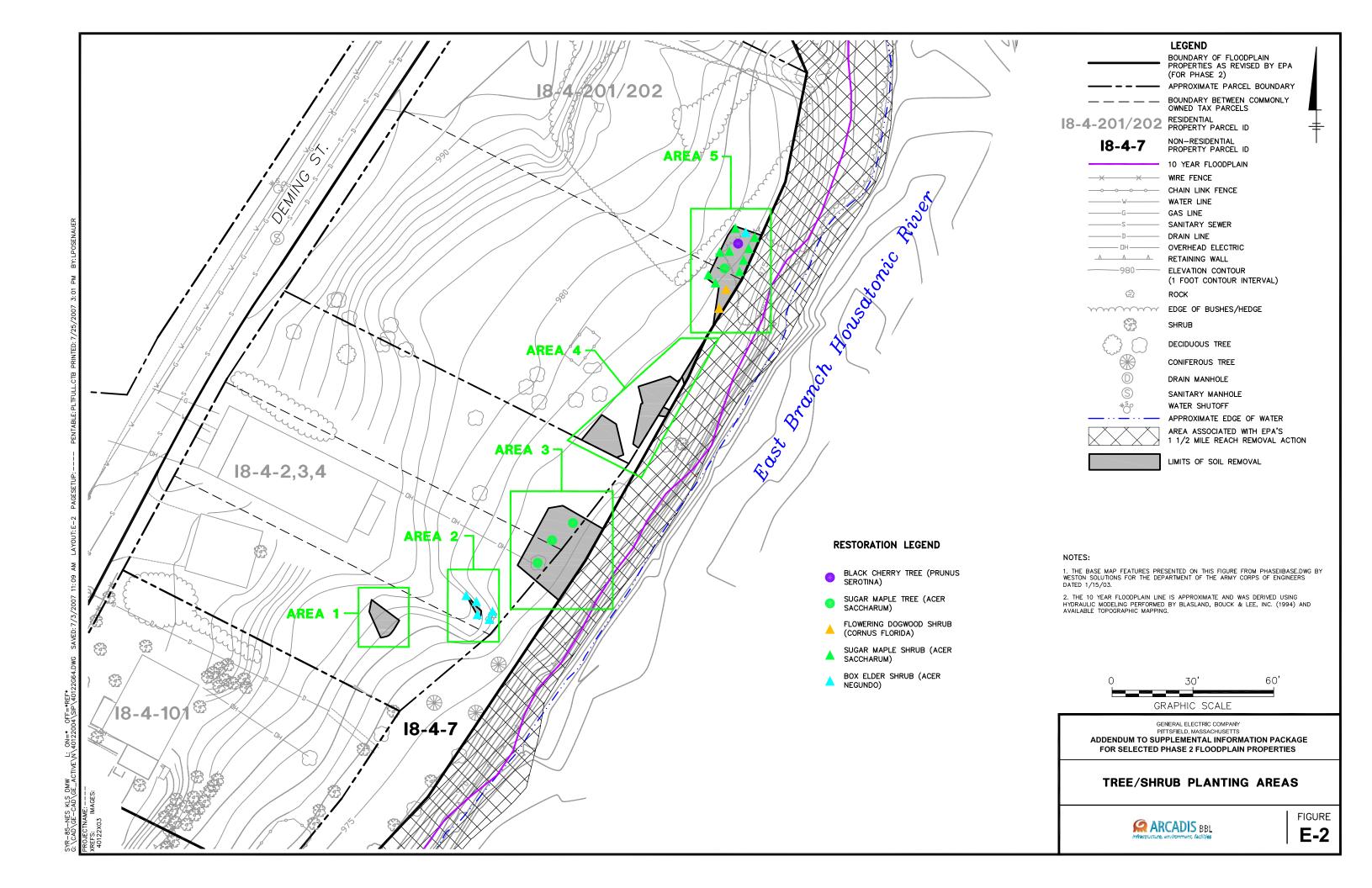
ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR SELECTED PHASE 2 FLOODPLAIN PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

		Туре		
Planting Area	Parcel(s)	(inches in diameter)	Quantity	Species
1	18-4-2,-3,-4		0	
2	18-4-2,-3,-4	Shrub	5	Box Elder (Acer negundo)
3	18-4-2,-3,-4; 18-4-7	Tree (1.5 - 2")	3	Sugar Maple (Acer saccharum)
4	18-4-7; I8-4-201/202		0	
		Tree (1.5 - 2")	1	Black Cherry (Prunus serotina)
		Tree (1.5 - 2")	1	Sugar Maple (Acer saccharum)
5	18-4-201/202	Shrub	9	Sugar Maple (Acer saccharum)
		Shrub	2	Flowering Dogwood (Cornus florida)
		Shrub	1	Box Elder (Acer negundo)

Notes:

- 1. Small trees/shrubs (i.e., box elders, sugar maples, and any substitutions) shall be a minimum of four feet in height.
- 2. Refer to Figure E-2 for tree/shrub planting areas.
- 3. Tree/shrub restoration activities shall be performed in accordance with Materials and Performance Section 02210 Floodplain Tree and Shrub Planting.
- 4. -- Not applicable.



MATERIALS AND PERFORMANCE - SECTION 02210

FLOODPLAIN TREE AND SHRUB PLANTING

PART 1 - GENERAL

1.01 SECTION INCLUDES

- A. Seeding and plant introduction for restored floodplain.
- B. Maintenance of restored areas.

1.02 QUALIFICATIONS

- A. Planting Stock Supplier: Obtain planting stock only from established vendors capable of providing plant stocks in quantities and at quality levels adequate to complete the project.
- B. Installer: Company specializing in work of this Section with minimum 5 years experience in planting and establishing natural plant communities with documented references. Personnel used to perform the installation of plant materials shall also have occupational experience in vegetation restoration projects.

PART 2 - PRODUCTS AND PRODUCT HANDLING

2.01 PLANT STOCK

- A. The shrub and sapling species, plant types, sizes, and planting locations for the floodplain restoration are presented on Table E-2 and Figure E-2.
- B. Plants shall be true to their name as specified.
- C. Plants shall be free of insects and diseases and shall show the appearance of healthy growth and vigor. Root stocks shall display evidence of new growth prior to planting.
- D. All plant materials, including collected stock, shall comply with state and federal laws with respect to inspection for plant diseases and insect infestations.
- E. Each species shall be handled and placed in a manner that is consistent with good trade practice to insure the arrival of the plants at site in good condition. Plants that arrive dried out, exposed to excessive heat, or that have been in storage for extended periods of time, will not be accepted. If, upon inspection, the plants or root stocks display mold or decay, the material will not be accepted.
- F. All woody shrubs and trees shall have a heavy fibrous root system that has been developed by proper horticultural treatment, transplanting, and root pruning. All shrubs and saplings shall be container grown.

MATERIALS AND PERFORMANCE - SECTION 02210

FLOODPLAIN TREE AND SHRUB PLANTING

G. All plant stock shall be stored in aboveground locations in non-construction areas approved by the Engineer if not transplanted directly into the ground. All plant stock shall have soil placed about roots sufficient to protect from desiccation and to provide nourishment during storage. All plants stored in the field prior to installation shall be kept cool and shall be sheltered from the drying effects of direct sunlight and prevailing winds. Plants should not be subject to freezing, drying, or warming. It is the Contractor's responsibility to supply adequate water for all plant stock in order to maintain it in a healthy and vigorous state suitable for transplanting.

PART 3 - EXECUTION

3.01 PLANTING OF TREES AND SHRUBS

- A. Use species, plant types, sizes, and spacing densities as presented on Table E-2 and Figure E-2.
- B. Dig pits and beds at least 6 inches larger than the plant root system to be installed in that location.
- C. Remove non-biodegradable containers prior to planting.
- D. Set plants into their final locations following recommended horticultural practice for that species.
- E. Support plants as follows:
 - 1. One-inch diameter: one stake and one tie.
 - 2. Two-inch diameter: two stakes and two ties.
- F. Provide and install wood chip mulch by hand to form a continuous blanket over the soil surrounding the plant, approximately 2 inches uniform thickness at loose measurement.
- G. An initial watering of planted areas will be performed and repeated after the second and fourth weeks following seeding if natural rainfall is less than 1 inch per week. The contractor shall avoid creating rills and furrows as a result of watering and must repair and reseed any rills and furrows resulting from over watering.
- H. Environmental Requirements of Seeding and Planting
 - 1. Do not install plant life when the temperature may drop below 35 degrees F or rise above 90 degrees F.
 - 2. Do not install plant life when the wind velocity exceeds 30 miles per hour.
- I. Sequencing and Scheduling
 - 1. Trees and shrubs planted in the floodplain shall be container-grown and installed after September 1 and before June 30.

MATERIALS AND PERFORMANCE - SECTION 02210

FLOODPLAIN TREE AND SHRUB PLANTING

PART 4 - MAINTENANCE

- A. Maintain planted areas until accepted by the Engineer. Maintenance responsibilities begin immediately after planting.
- B. Maintenance responsibilities include control of herbivores and other vectors which threaten the establishment of the plant community; acts of vandalism resulting in tree or shrub damage; acts of nature which result in erosions, fires, wind damage, ice storms, and similar situations. The Contractor shall take necessary action to correct and restore the system.
- C. Notify the Engineer prior to and following any maintenance activity.
- D. At a minimum, maintenance shall be performed in the spring and fall before optimal planting and seeding season.
- E. Replace dead or unhealthy plants with plants of the same size and species as specified and planted in the next growing season and subject to maintenance efforts to assure their survival.

- END OF SECTION -